



November 2, 2015

Ms. Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

In the Matters of: Connect America Fund, WC Docket No. 10-90;
Lifeline Modernization, WC Docket No. 11-42;
Telecommunications Carriers Eligible for
Universal Service Support, WC Docket No. 09-197

Dear Ms. Dortch,

On October 29, 2015, Zainab Alkebsi, Policy Counsel with the National Association of the Deaf, and the undersigned, General Manager and General Counsel of Odin Mobile, met with Jay Schwarz, Ryan Palmer, Trent Harkrader, Jodie Griffin, Nathan Eagan, Christian Hoefly, and Charles Eberle from the Wireline Competition Bureau, and Karen Peltz Strauss and Gregory Hlibok from the Consumer and Government Affairs Bureau, to discuss issues relating to the above-referenced dockets.

Specifically, we discussed how budget phones provided by eligible telecommunications carriers to Lifeline consumers would not meet the needs of individuals with disabilities, including people who are blind, deaf, hard of hearing, or those who have mobility disabilities. Such phones would not provide adequate screen readers for people who are blind and would likely not have the ability to provide adequate Video Relay Services or captioned telephone services for people who are deaf or hard of hearing. As a result, people with disabilities will not be able to partake fully in the Lifeline program.

We further discussed Odin Mobile's proposal to address this problem: that the Commission add an eligibility criteria such that any person who receives telecommunications equipment from a state equipment distribution program be automatically eligible for Lifeline. This eligibility criteria would apply only in states that included broadband enabled devices in their programs. Further, the State programs that included broadband enabled devices would be permitted to have income thresholds greater than 135 percent of the Federal Poverty Guidelines. The higher income thresholds are appropriate because individuals with disabilities have higher expenses, as recognized by the Commission in the context of the deaf-blind equipment distribution program.

We informed those present that a number of state equipment distribution programs currently provide broadband enabled devices, at no cost, to individuals with disabilities and that these devices are typically "premium" devices, such as iPhones or iPads that provide the

functionalities that people with disabilities require. The Commission should encourage and incentivize additional States to offer such equipment by adopting the proposal.

Ms. Alkebsi also urged the Commission to support unlimited text messages for individuals who are deaf and hard of hearing in addition to a higher level of speed and unlimited data in order to access Video Relay Services and captioned telephone services.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Robert Felgar". The signature is fluid and cursive, with the first name "Robert" and last name "Felgar" clearly distinguishable.

Robert Felgar
General Manager and General Counsel
Odin Mobile

Zainab Alkebsi
Policy Counsel
National Association of the Deaf

cc: Jay Schwarz
Ryan Palmer
Trent Harkrader
Jodie Griffin
Nathan Eagan
Christian Hoefly
Charles Eberle
Karen Peltz Strauss
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